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4 Attorney for Debtor(s) Dale McKinley Kent & Cara Ann Kent

5 UNITED STATES BANKRUPTCY COURT
6 EASTERN DISTRICT OF CALIFORNIA
7 SACRAMENTO

8 In re

9 Dale McKinley Kent
XXX-XX-2846

10 Cara Ann Kent
11 XXX-XX-9355

12 Debtors.

Case No. 09-48445-C-7

DC No.: SNM-1
DATE: FEBRUARY 9, 2010
TIME: 9:30 A.M.
DEPT#: C - COURTROOM 35
HONORABLE JUDGE KLEIN

13 **MOTION FOR AN ORDER APPROVING ABANDONMENT**

14 TO THE HONORABLE BANKRUPTCY JUDGE,

15 The Motion of Dale McKinley Kent & Cara Ann Kent respectfully represents:

- 16 1. Movants filed a voluntary petition for relief under Title 11 of the United States
code on December 29, 2009.
- 17 2. At the time of the entry of the order for relief debtors were in possession of the
18 following described property: Dale M Kent (general contractor & handyman),
located at 367 Woodside Cir, Vacaville, CA 95688, consisting of personal
19 property described on Schedule B and as more particularly described on debtors
declaration filed herewith.
- 20 3. The property so described is claimed as exempt by the debtors under CCP
21 703.140(b)(6) and no administration by the trustee is contemplated.
- 22 4. Movants desire to continue to operate said business during the pending of the
bankruptcy proceeding and require an order of abandonment under

Bankruptcy Rule 6007.

WHEREFORE, Movant prays that the trustee in the above-stated case be required to abandon said personal property and for such other and further relief as is just and proper.

Dated: January 7, 2010

/s/ Stephen Murphy
STEPHEN MURPHY
Attorney for Movants